

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Carla N. Young

Debtor

CHAPTER 13

MidFirst Bank

Movant

vs.

NO. 15-13504 MDC

Carla N. Young

Debtor

William C. Miller Esq.

Trustee

11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. Movant is MidFirst Bank.
2. Debtor is the owner of the premises 417 South 2nd Street, Darby, PA 19023, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$105,052.00 on the mortgaged premises that was executed on June 29, 2007. Said mortgage was recorded on July 27, 2007 at Book 04163, Page 1670. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on September 19, 2011, at Book 04991, Page 2356 in Delaware County.
4. William C. Miller Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor.
6. On May 20, 2016 Debtor filed an Amended Chapter 13 plan surrendering the subject property.
7. The Amended Plan was confirmed on June 9, 2016.
8. Movant and Debtor have agreed that Movant is entitled to relief from the automatic stay effective upon the entry of the June 9, 2016 confirmation Order.
9. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.

10. The parties agree that a facsimile signature shall be considered an original signature.

Date: June 30, 2016

By: /s/ Joshua I. Goldman, Esquire
Joshua I. Goldman, Esquire
Attorneys for Movant
KML Law Group, P.C.
Main Number: (215) 627-1322

Date: June 30, 2016

/s/ Mitchell J. Prince, Esquire
Mitchell J. Prince, Esquire
Attorney for Debtor

9/8/16

No Objection:

Magdelina D. Coleman
TRUSTEE

*without prejudice to any
trustee rights or remedies

Approved by the Court this 12th day of July, 2016. However, the court retains discretion regarding entry of any further order.

Magdelina D. Coleman

Bankruptcy Judge
Magdelina D. Coleman